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January 6, 2020

BY ECF

Honorable Lisa Margaret Smith, United States Magistrate Judge
U.S. District Court for the Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: Mills v. Rehabilitation Support Services, Inc. et al. 7:17-cv-05229

Dear Honorable Magistrate Smith:

The undersigned represents plaintiff Tia S. Mills in the above-referenced litigation. The purpose of this brief update is to seek a 14-day extension of time until January 24, 2020 to complete paper discovery in this matter. The current deadline is January 10, 2020. However, due to the job demands of the U.S. Postal Service applicable to mail carriers (including the plaintiff) during the 2019 holiday season, plaintiff's counsel was unable to meet with Ms. Mills to review the final draft of her interrogatory responses and have her execute the verification, have her input about some of the defendants' production and go over logistics relevant to progressing her case.

On Friday afternoon, December 20, 2019, the defendants' counsel, Kristi R. Winters, Esq., had emailed a reminder concerning the status of interrogatory responses, document production pertaining to emotional distress records (which were already archived by one of the mental health providers at a remote location causing delay) and mitigation, and your honor's minute entry order on November 25, 2019. The undersigned called opposing counsel to respond to her reminder and discuss discovery status, and the undersigned's proposal to seek a short extension. Attorney Winters was given an earlier draft of this letter on January 3, 2020 seeking this court's order granting a 14-day extension of time. While this letter is not a joint communication, defendants' counsel does not oppose the grant of the requested extension of time.

For the good cause reasons that hampered the undersigned counsel from working with the plaintiff between Thanksgiving and New Years Eve day, an extension of time through and including January 24, 2020 is reasonable and necessary to progress to the next stage in the discovery process (i.e. depositions). The plaintiff appreciates your honor's time to review the foregoing and to issue a ruling in favor of the extension requested herein.

Respectfully submitted,

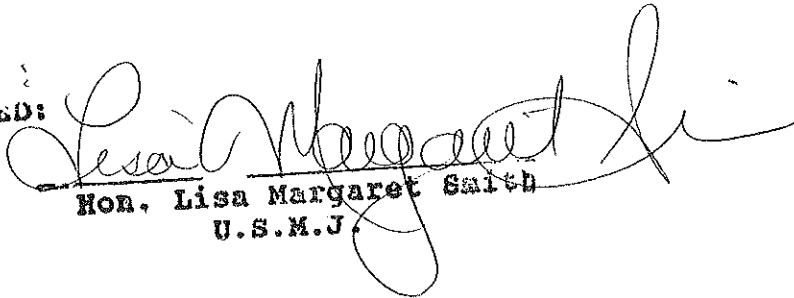
/s/ Jill L. Brooks

Jill L. Brooks, Esq.

cc: BY EMAIL TO:

Kristi R. Winters, Esq.

Granted:
SO ORDERED:


Hon. Lisa Margaret Smith
U.S.M.J.

1/6/2020